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6 Attorneys for Plaintiff ENDONOVO  
7 THERAPEUTICS, INC.

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 ENDONOVO THERAPEUTICS, INC.,  
a Delaware Corporation,

11 Plaintiff,

12 v.

13 KVP INTERNATIONAL, INC., a  
14 California Corporation,

15 Defendant.

Case No. 5:19-cv-00257-JAK-KK

**DECLARATION OF LEWIS E.  
HUDNELL, III IN SUPPORT OF  
PLAINTIFF ENDONOVO'S  
MOTION TO DISMISS ALL  
CLAIMS WITHOUT PREJUDICE  
UNDER FED. R. CIV. P. 41(a)(2)**

Judge: Hon. John A. Kronstadt

16 I, Lewis E. Hudnell, III, declare as follows:  
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- 18 1. I am a special counsel to Manning & Kass Ellrod, Ramirez, Trester LLP. I  
19 am duly licensed to practice law in the States of New York and California  
20 and admitted to this Court. I have personal knowledge of the facts in this  
21 declaration, and I am competent to testify to them if called to do so.  
22  
23 2. A true and correct copy of the Amended and Restated License Agreement  
24 between Rio Grande Neurosciences ("RGN") and AAH Holdings, LLC  
25 ("Assisi") dated October 1, 2016 ("the October 2016 License Agreement")  
26 is attached as Exhibit 1 to my declaration.  
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Case No.5:19-cv-00257-JAK-KK

DECLARATION OF LEWIS E. HUDNELL, III IN SUPPORT OF PLAINTIFF ENDONOVO'S MOTION TO  
DISMISS ALL CLAIMS WITHOUT PREJUDICE UNDER FED. R. CIV. P. 41(a)(2)

1 3. During the meet and confer that preceded Endonovo's Motion to Dismiss,  
2 Endonovo raised the issue that Assisi is arguably a necessary party. KVP  
3 did not dispute that Assisi is arguably a necessary party.  
4

5 4. During the meet and confer that preceded Endonovo's Motion to Dismiss,  
6 Endonovo asserted that Assisi could be joined to this case under Fed. R.  
7 Civ. P. 19. KVP did not contest this assertion.  
8

9 I declare under penalty of perjury that the statements in this declaration are  
10 true and correct and that I executed this declaration on October 7, 2019.  
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14 Lewis E. Hudnell, III  
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